

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 17-CV-1030

GREGORY BATES,

Defendant.

COMPLAINT

NOW COMES the plaintiff, United States of America, by and through its attorneys, Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Lisa Yun, Assistant United States Attorney for said district, and hereby states as its civil complaint against the defendant, Gregory Bates, as follows:

1. The United States District Court for the Eastern District of Wisconsin has jurisdiction over the subject matter of this civil action pursuant to Title 28, United States Code, Section 1345. Venue is proper pursuant to Title 28, United States Code, Section 1391.

2. The plaintiff, United States of America, is a sovereign body responsible for the conduct and operation of government. Through the Office of the United States Attorney for the Eastern District of Wisconsin, United States Department of Justice, it is responsible for the enforcement and collection of civil debts due and owing to the agencies, offices, and units of the United States of America.

3. Upon information and belief, the defendant, Gregory Bates, is an adult individual residing at 1407 56th Street, Kenosha, Wisconsin 53140, in the State and Eastern District of Wisconsin. As set forth in this complaint, the defendant is presently indebted to the plaintiff.

4. As described in the Certificate of Indebtedness attached to this Complaint as Exhibit A, the defendant owes the plaintiff the principal monetary sum of \$25,549.15, plus interest.

5. To date, the defendant has not paid the indebtedness to the plaintiff in full, although the plaintiff has made demand for payment.

WHEREFORE, the plaintiff, United States of America, hereby requests that the Court enter a civil judgment against the defendant in these amounts: \$25,549.15 in principal; \$29,664.01 in interest accrued through April 26, 2017; additional interest accruing thereafter and to the date of the entry of judgment at the annual rate of 9%; and additional interest accruing at the legal rate from the date of the entry of judgment until the indebtedness is paid in full.

The plaintiff, United States of America, further requests that the Court award it the reasonable costs and expenses incurred in the litigation of this action, along with such other legal and equitable relief as it deems appropriate.

Respectfully submitted at Milwaukee, Wisconsin this 24th day of July, 2017.

GREGORY J. HAANSTAD
United States Attorney

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